

Remarks

Reconsideration and withdrawal of the rejection set forth in the above-mentioned Official Action in view of the following remarks are respectfully requested.

Claims 1, 3-9 and 11-20 remain pending in the application, with Claims 1, 9, 13 and 15 being independent.

Applicant notes with appreciation the indication that Claims 1-14 are allowed. These claims have not been amended herein, thus remaining in condition for allowance.

Claims 15-20 were rejected under 35 U.S.C. § 102 as being anticipated by U.S. Patent No. 5,111,302 (Chan et al.). This rejection is respectfully traversed.

As is recited in independent Claim 15, the present invention relates to a printing apparatus for gray scale printing. The apparatus includes means for acquiring gray scale values of surrounding pixels of a print pixel to be printed, means for comparing the gray scale values of the surrounding pixels and a gray scale value of the print pixel to be printed, and means for determining a pattern positioning dots in the print pixel based on a result of the comparison means.

Chan et al. relates to a method and system for enhancing image quality. Chan et al. can effect gray scale printing of dots of one or more colors into pixels and in a controlled ordered sequence into a plurality of super pixels. As understood by Applicant, Chan et al. discloses forming one pixel (a subject pixel) comprised of 2 x 2 dots, and controlling drop counts forming the one pixel so as not to exceed a maximum allowable dot loading based on a predetermined maximum allowable drop count V_{\max} . Applicant

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submits that Chan et al. does not disclose or suggest detecting gray scale values of surrounding pixels of a subject or print pixel. Rather, Chan et al. merely discloses changing the 2 x 2 dots comprising the subject pixel based on a gray scale value of the subject pixel itself, rather than gray scale values of surrounding pixels of the subject pixel.

Accordingly, Chan et al. fails to disclose or suggest at least means for comparing gray scale values of surrounding pixels and a gray scale value of a print pixel to be printed, and means for determining a pattern positioning dots in the print pixel based on a result of the comparison means, as is recited in independent Claim 15.

Thus, Chan et al. fails to disclose or suggest important features of the present invention recited in independent Claim 15.

Thus, independent Claim 15 is also patentable over the citations of record. Reconsideration and withdrawal of the § 102 rejection are respectfully requested.

For the foregoing reasons, Applicant respectfully submits that the present invention is also patentably defined by independent Claim 15. Dependent Claims 16-20 are also allowable, in their own right, for defining features of the present invention in addition to those recited in their respective independent claim. Individual consideration of these dependent claims is requested.

Applicant submits that the present application is in condition for allowance. Favorable reconsideration, withdrawal of the rejection set forth in the above-noted Office Action, and an early Notice of Allowability are requested.

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Applicant's undersigned attorney may be reached in our Washington, D.C. office by telephone at (202) 530-1010. All correspondence should continue to be directed to our below-listed address.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Mark D. Williams", written over a horizontal line.

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